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NEW MEXICO ENVIRONMENT DEPARTMENT

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BUTCH TONGATE
Cabinet Secretary

J. C. BORREGO
Deputy Secretary

Certified Mail - Return Receipt Requested

August 28, 2018

Louis Abruzzo, President
Sandia Peak Ski & Tramway
10 Tramway Loop
Albuquerque, NM 87122

Re: **Sandia Peak Ski & Tramway WWTP (WWTP); SIC 4952; NPDES Compliance Evaluation Inspection;
NPDES Permit No. NM0027863; Inspection Date: August 08, 2018**

Dear Mr. Abruzzo:

Enclosed please find a copy of the report and check list for the referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act.

Introduction, detailed site observations, and findings noted during this inspection are discussed in the "further explanations" section of the inspection report.

You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and advised to modify your operational and/or administrative procedures, as appropriate. If you have comments on or concerns with the basis for the findings in the NMED inspection report, please contact us (see the address below) in writing within 30 days from the date of this letter. Further, you are encouraged to notify in writing both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

David Long
US Environmental Protection Agency, Suite 1200
Enforcement Branch (6EN-WS)
1445 Ross Avenue
Dallas, Texas 75202-2733

Sarah Holcomb, Program Manager
New Mexico Environment Department
Surface Water Quality Bureau
Point Source Regulation Section
P.O. Box 5469
Santa Fe, New Mexico 87502

Sandia Peak Ski & Tramway
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August 28, 2018

If you have any questions about this inspection report, please contact Sandra Gabaldón at (505) 827-1041 or at Sandra.gabaldon@state.nm.us

Sincerely,

Sarah Holcomb, Program Manager
Surface Water Quality Bureau

Cc: Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
David Long, USEPA (6EN-WM) by e-mail
Amy Andrews, USEPA (6EN-WM) by e-mail
David Esparza, USEPA (6EN-WM) by e-mail
Darlene Whitten-Hill, USEPA (6EN-WC) by e-mail
Nancy Williams, USEPA (6EN-WC) by e-mail
John Rhoderick, District I, NMED by e-mail

SH/sg



Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspec. Type	Inspector	Fac Type
1 N 2 5 3 N M 0 0 2 7 8 6 3 11 12 1 8 0 8 1 5 17 18 C 19 S 20 2					
Remarks					
M I N O R N O N - M U N I C I P A L					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 1 69	70 3	71 N	72 N	73 74 75	80

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Sandia Peak Ski & Tramway 10 Tramway Loop, NE Albuquerque, New Mexico 87122 Bernalillo County	Entry Time /Date 0915 Hours / August 15, 2018	Permit Effective Date June 1, 2016
	Exit Time/Date 1200 Hours / August 15, 2018	Permit Expiration Date May 31, 2021
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Randy Adair, Utility Manager / (505) 856-6345 / (505) 259-5432 (cell) / (505) 853.1035 (fax) Radair@sandiapeak.com		Other Facility Data N 35.194822 W -106.433317 SIC 4952
Name, Address of Responsible Official/Title/Phone and Fax Number Louis Abruzzo, President / (505) 856-6419 10 Tramway Loop, NE Albuquerque, New Mexico 87122	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	S	Flow Measurement	S	Operations & Maintenance	N	CSO/SSO
S	Records/Reports	S	Self-Monitoring Program	S	Sludge Handling/Disposal	N	Pollution Prevention
S	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	M	Laboratory	N	Storm Water	N	Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

1. Please see checklist and further explanations for details.

Name(s) and Signature(s) of Inspector(s) Sandra Gabaldon	Agency/Office/Telephone/Fax NMED/SWQB/(505) 827-1041 /(505) 827-0160	Date August 28, 2018
Signature of Management QA Reviewer Sarah Holcomb, Program Manager	Agency/Office/Phone and Fax Numbers NMED/SWQB (505) 827-2798 / (505) 827-0160	Date August 28, 2018

SANDIA PEAK SKI & TRAMWAY COMPANY		NPDES PERMIT NO. NM0027863
SECTION A - PERMIT VERIFICATION		
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS		<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA (FURTHER EXPLANATION ATTACHED <u>NO</u>)
DETAILS:		
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE		<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES		<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT		<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
4. ALL DISCHARGES ARE PERMITTED		<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
SECTION B - RECORDKEEPING AND REPORTING EVALUATION		
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT.		<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA (FURTHER EXPLANATION ATTACHED <u>NO</u>)
DETAILS:		
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs.		<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE.		<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA
a) DATES, TIME(S) AND LOCATION(S) OF SAMPLING		<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
b) NAME OF INDIVIDUAL PERFORMING SAMPLING		<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
c) ANALYTICAL METHODS AND TECHNIQUES.		<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
d) RESULTS OF ANALYSES AND CALIBRATIONS.		<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
e) DATES AND TIMES OF ANALYSES.		<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
f) NAME OF PERSON(S) PERFORMING ANALYSES.		<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE.		<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR.		<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA.		<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
SECTION C - OPERATIONS AND MAINTENANCE		
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED.		<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA (FURTHER EXPLANATION ATTACHED <u>NO</u>)
DETAILS:		
1. TREATMENT UNITS PROPERLY OPERATED.		<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA
2. TREATMENT UNITS PROPERLY MAINTAINED.		<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED .		<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE.		<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA
5. ALL NEEDED TREATMENT UNITS IN SERVICE		<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED.		<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED.		<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE.		<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED.		<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED.		<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA

SANDIA PEAK SKI & TRAMWAY COMPANY		NPDES PERMIT NO. NM0027863
SECTION C - OPERATIONS AND MAINTENANCE (CONT'D)		
9. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR? IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED? HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS?		<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA
10. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT? IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT?		<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA
SECTION D - SELF-MONITORING		
PERMITTEE SELF-MONITORING MEETS PERMIT REQUIREMENTS. DETAILS:		<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA (FURTHER EXPLANATION ATTACHED <u>NO</u>).
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT.		<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES.		<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT.		<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT.		<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT.		<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
6. SAMPLE COLLECTION PROCEDURES ADEQUATE		<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
a) SAMPLES REFRIGERATED DURING COMPOSITING.		<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
b) PROPER PRESERVATION TECHNIQUES USED.		<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
c) CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136.3.		<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
7. IF MONITORING AND ANALYSES ARE PERFORMED MORE OFTEN THAN REQUIRED BY PERMIT, ARE THE RESULTS REPORTED IN PERMITTEE'S SELF-MONITORING REPORT?		<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA
SECTION E - FLOW MEASUREMENT		
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS. DETAILS:		<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA (FURTHER EXPLANATION ATTACHED <u>NO</u>)
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED. Closed Pipe – Propeller Meter		<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED.		<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED.		<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
4. CALIBRATION FREQUENCY ADEQUATE. RECORDS MAINTAINED OF CALIBRATION PROCEDURES. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE.		<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
5. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE.		<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA
6. HEAD MEASURED AT PROPER LOCATION.		<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA
7. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES.		<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
SECTION F – LABORATORY		
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS. DETAILS:		<input type="checkbox"/> S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA (FURTHER EXPLANATION ATTACHED <u>YES</u>)
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(b) FOR SLUDGES)		<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA

SANDIA PEAK SKI & TRAMWAY COMPANY

NPDES PERMIT NO. NM0027863

SECTION F - LABORATORY (CONT'D)

2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED ☐ Y ☐ N ☒ NA3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT. ☒ S ☐ M ☐ U ☐ NA4. QUALITY CONTROL PROCEDURES ADEQUATE. ☐ S ☒ M ☐ U ☐ NA5. DUPLICATE SAMPLES ARE ANALYZED. 100 % OF THE TIME. ☒ Y ☐ N ☐ NA6. SPIKED SAMPLES ARE ANALYZED. % OF THE TIME. ☐ Y ☐ N ☒ NA7. COMMERCIAL LABORATORY USED. ☒ Y ☐ N ☐ NALAB NAME SAGE ATC Environmental Consulting Hall Environmental Environmental Testing ServicesLAB ADDRESS 832 67th St, Oklahoma City, OK 78116 4901 Hawkins St., NE: Albuquerque, NM 4501 Bogan Ave., NE: Albuquerque, NM 87108PARAMETERS PERFORMED: Biomonitoring BOD, TSS, E. Coli BOD, TSS, E. Coli (duplicates)SECTION G - EFFLUENT/RECEIVING WATERS OBSERVATIONS. ☐ S ☐ M ☐ U ☒ NA (FURTHER EXPLANATION ATTACHED NO).

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER
001							

RECEIVING WATER OBSERVATIONS : This is a sequencing batch reactor. No discharge was occurring during this inspection.

SECTION H - SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS. ☒ S ☐ M ☐ U ☐ NA (FURTHER EXPLANATION ATTACHED NO).
DETAILS: Sludge is removed by a sludge pumping service approximately once per year.1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY. ☒ S ☐ M ☐ U ☐ NA2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503. ☐ S ☐ M ☐ U ☒ NA3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: N/A (e.g., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE)SECTION I - SAMPLING INSPECTION PROCEDURES (FURTHER EXPLANATION ATTACHED).1. SAMPLES OBTAINED THIS INSPECTION. ☐ Y ☐ N ☒ NA

2. TYPE OF SAMPLE OBTAINED

GRAB COMPOSITE SAMPLE METHOD FREQUENCY 3. SAMPLES PRESERVED. ☐ Y ☐ N ☐ NA4. FLOW PROPORTIONED SAMPLES OBTAINED. ☐ Y ☐ N ☐ NA5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE. ☐ Y ☐ N ☐ NA6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE. ☐ Y ☐ N ☐ NA7. SAMPLE SPLIT WITH PERMITTEE. ☐ Y ☐ N ☐ NA8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED. ☐ Y ☐ N ☐ NA9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT. ☐ Y ☐ N ☐ NA

Sandia Peak Ski & Tramway Company
NPDES Permit No. NM0027862
Compliance Evaluation Inspection
Date of Inspection: August 15, 2018

Introduction:

A Compliance Evaluation Inspection (CEI) was conducted at the Sandia Peak Ski & Tramway Company Wastewater Treatment Plant located at the Sandia Crest on August 15, 2018 by Sandra Gabaldón, and Daniel Valenta of the State of New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB). This facility is classified as a minor, private domestic facility by the federal Clean Water Act (CWA), Section 402 National Pollutant Discharge Elimination System (NPDES) permit program and is assigned NPDES permit number NM0027863. The facility production flow is 0.0075 million gallons per day (MGD).

The facility discharges into unclassified reaches of the Canon de Domingo Baca, thence to Arroyo de Domingo Baca, thence to a classified reach of the Rio Grande in Segment 20.6.4.105 NMAC (*State of New Mexico Standards for Interstate and Intrastate Surface Waters*) of the Rio Grande Basin. Designated uses of Segment 20.6.4.105 are irrigation, marginal warmwater aquatic life, livestock watering, wildlife habitat and secondary contact.

The inspectors arrived at the base of the Sandia Tram at 0915 hours and conducted an entrance interview with Mr. Randy Adair, Utility Manager. The inspectors made introductions, Ms. Gabaldón presented credentials, and discussed the purpose of the inspection with Mr. Adair. An exit interview to discuss preliminary findings of the inspection was conducted at 1200 hours with Mr. Adair.

The NMED performs a specific number of CEI's annually for the United States Environmental Protection Agency (USEPA). The purpose of this inspection is to provide the USEPA with information to evaluate the permittee's compliance with their NPDES permit. The enclosed inspection report is based on verbal information supplied by the permittee's representative, observations made by the NMED inspectors, and a review of records maintained by the permittee, commercial laboratories, and/or NMED. Findings of the inspection are detailed on the attached EPA form 3560-3 and in the narrative Further Explanations section of the report.

Treatment Scheme:

Wastewater from the top terminal building flows by gravity to the wastewater treatment plant located approximately 200 yards downhill. The flow enters a wet well containing a 150 gpm submersible pump. Liquid level sensors in the wet well determine when the pump lifts the wastewater to the aeration basin.

Wastewater is lifted to the aeration basin of this sequencing batch reactor (SBR) treatment system. The SBR unit runs off an automated timer (PCL) and discharges approximately every 12 hours. Mixed liquor suspended solids (MLSS) are maintained at 3,500 to 4,500 mg/L. The cycles involved in the SBR include filling, aeration, settling and decant. Decant occurs through a vacuum-based mechanism that employs piping approximately 18 inches long. The mechanism extends into clear water, below the surface of the water level, thereby avoiding the discharge of floating foam or solids.

Water decanted from the SBR unit then enters an ultraviolet disinfection unit. The bulbs and sleeves of the UV system are changed annually. From the UV system, a pipe leads the effluent to the discharge point. The discharge is located off the side of the cliff and was inaccessible to the inspectors.

Sandia Peak Ski & Tramway Company
NPDES Permit No. NM0027862
Compliance Evaluation Inspection
Date of Inspection: August 15, 2018

Further Explanations:

Note: The sections are arranged according to the format of the enclosed EPA Inspection Checklist (Form 3560-3), rather than being ranked in order of importance.

Section F – Laboratory Evaluation – Overall Rating of “Marginal”

The permit states, in Part III, Section C.5.a:

Monitoring must be conducted according to test procedures approved under 40 CFR 136, unless other test procedures have been specified in the permit or approved by the Regional Administrator.

Findings for Laboratory:

The permittee has various contract laboratories that do analysis of their parameters. Hall Environmental Analysis Laboratory does monthly analyses of Biochemical Oxygen Demand (BOD), E. Coli (MPN), and Total Suspended Solids (TSS). Sage ATC Environmental Consulting does their biomonitoring and Environmental Testing Service does their duplicate samples for quality assurance/control. The permittee does their own pH testing and flow monitoring.

Hall Environmental provides the method being used for BOD (SM 5210B), E. coli (SM 9223 B) and TSS (SM 2540D); but does not indicate the edition of each method being used. This information should also be recorded on their bench sheet as some methods in Standard Methods change with each edition produced and are no longer approved by 40 CFR 136. For instance, the most recent approved method for BOD from 40 CFR 136 is 2011; the 18th Edition of Standard Methods is 1998.

There are specific quality assurance and quality controls required by the BOD method. The BOD method is based on oxygen depletion. Therefore, the analyst must insure that enough oxygen is in the bottles at the beginning of the test and that enough oxygen remains in the bottle at the completion of the test. There should be at least 2.0 mg/L of dissolved oxygen consumed in the sample bottles during incubation or the results from that bottle are not included in calculating the BOD, and at least 1.0 mg/L of dissolved oxygen must remain in the sample bottles following incubation or the results are not included in calculating the BOD. This information should be reported on the discharge monitoring report. The bench sheets from Hall Environmental on 06/25/2018, 05/08/18, 04/09/18 and 03/14/2018 indicate that DO Depletion was <2.0 mg/L.

In April and May 2018, the laboratory reported that the temperature of samples was at 9.3°C and 10.4°C, respectively when chain of custody was filled and samples relinquished by Mr. Randy Adair, representative of Sandia Peak Tram. According to 40 CFR 136, Table II, Required Containers, Preservation Techniques and Holding Times, the required preservation technique for BOD, TSS and E. coli is "cooling". The temperature preservation for BOD and TSS is $\leq 6^{\circ}\text{C}$ and for E. coli $\leq 10^{\circ}\text{C}$. The laboratory analyzing these analytes is in Albuquerque, approximately a half hour drive from the permitted site.